

EXHIBIT 7

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF NEW JERSEY

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4 IN RE: JOHNSON & JOHNSON :
5 TALCUM POWDER PRODUCTS :
6 MARKETING, SALES PRACTICES, :
7 AND PRODUCTS LIABILITY :
8 LITIGATION :
9 THIS DOCUMENT RELATES TO: : MDL No. 16-2738
10 :
11 HILARY CONVERSE, et al., :
12 Plaintiff, : Case No. 3:18-cv-
13 v : 17586-FLW-LHG
14 JOHNSON & JOHNSON, et al., :
15 Defendants. :
16 -----

17 JANUARY 28, 2021
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20 Remote Oral Video Deposition, taken
21 via Zoom, of PETER SCHWARTZ, M.D.,
22 commencing at 10:01 a.m., on the above date,
23 before Margaret M. Reihl, Realtime Reporter
24 and Certified Court Reporter for the State
25 of New Jersey.

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30

1 having a genetic mutation in her family."

2 Do you see that language that I've
3 highlighted?

4 A. I do see that.

5 Q. Do you agree with Dr. Hofstatter's belief of
6 the likelihood of a genetic mutation in
7 Ms. Converse's family?

8 MS. GARBER: Object to the form.

9 THE WITNESS: What I can say is that
10 I would -- as a clinician I would be
11 concerned when somebody who is an expert in
12 breast cancer writes that kind of a note, I
13 would be very concerned that there's a
14 genetic mutation yet to be identified in
15 this family.

16 BY MR. JAMES:

17 Q. All right. Dr. Schwartz, I'm going to stop
18 sharing.

19 A. Okay.

20 Q. Dr. Schwartz, is it fair to say that
21 Ms. Converse's family history is significant for
22 cancer risk, including ovarian cancer risk?

23 A. It would appear to be so, yes.

24 Q. Is it fair to say that Ms. Converse's
25 healthcare providers, including yourself, have

1 concern that there maybe a genetic mutation or an
2 unidentified syndrome contributing to her cancer
3 risk, including her ovarian cancer risk?

4 MS. GARBER: Objection to the form.

5 THE WITNESS: Yes, okay.

6 BY MR. JAMES:

7 Q. Have you ever told Ms. Converse that her
8 family history did not place her at increased risk
9 for ovarian cancer?

10 A. Not to my knowledge.

11 Q. Have you ever told Ms. Converse that she
12 does not have an undiscovered genetic mutation that
13 may be relevant to her ovarian cancer?

14 A. No.

15 Q. Have you ever told Ms. Converse that you
16 have ruled out her family history as relevant to her
17 ovarian cancer risk?

18 A. No, not to my knowledge.

19 Q. Have you ever told Ms. Converse that you
20 have ruled out genetics as relevant to her ovarian
21 cancer risk?

22 A. Not to my knowledge.

23 Q. And then now separate from what you -- the
24 questions about what you have told Ms. Converse, as
25 a clinician have you, yourself, ruled out